

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

No. 14 CR 135-3

v.

Judge Virginia M. Kendall

KAREN FINLEY

UNOPPOSED MOTION FOR ENTRY OF
PROTECTIVE ORDER GOVERNING DISCOVERY

Pursuant to Fed. R. Crim. P. 16(d) and 18 U.S.C. § 3771(a), the United States of America, by ZACHARY T. FARDON, United States Attorney for the Northern District of Illinois, moves for the entry of a protective order, and in support thereof states as follows:

1. The indictment in this case charges defendant with nine counts of mail fraud, three counts of wire fraud, three counts of federal program bribery, and one count of conspiracy to commit federal program.

2. The discovery to be provided by the government in this case includes sensitive information, whose unrestricted dissemination could adversely affect law enforcement interests and the privacy interests of third parties.

3. Undersigned counsel has spoken to counsel for defendant KAREN FINLEY, who does not oppose the instant motion.

WHEREFORE, the government respectfully moves this Court to enter the proposed protective order.

Respectfully submitted,

ZACHARY T. FARDON
United States Attorney

By: /s/ Carrie E. Hamilton
CARRIE E. HAMILTON
Assistant U.S. Attorney
219 South Dearborn St.
Chicago, Illinois 60604
(312) 353-4558

Dated: August 14, 2014